

Indicators of Suspicious Financial Activity

- 1** Account transactions that are inconsistent with past deposits or withdrawals
- 2** Transactions involving a high volume of incoming or outgoing wire transfers with no logical or apparent purpose that come from, go to, or transit locations of concern (for example, sanctioned countries, noncooperative nations, and sympathizer nations)
- 3** Unexplainable clearing or negotiation of third-party checks and their deposits in foreign bank accounts
- 4** Breaking transactions larger than \$10,000 into smaller amounts by making multiple deposits or withdrawals or by buying cashier's checks, money orders, or other monetary instruments to evade reporting requirements
- 5** Corporate layering (that is, transfers between bank accounts of related entities or charities for no apparent reason)
- 6** Wire transfers by charitable organizations to companies located in countries known to be bank or tax havens
- 7** Charitable bank deposits that lack signs of fund-raising activity (for example, lack of small checks or typical donations)
- 8** Use of multiple accounts to collect funds that are transferred to the same foreign beneficiaries
- 9** Transactions without logical economic purpose (that is, no link between the activity of the organization and other parties involved in the transaction)
- 10** Overlapping corporate officers, bank signatories, or other identifiable similarities associated with the same addresses, references, and financial activities
- 11** Cash-debiting schemes in which deposits in the United States correlate directly with ATM cash withdrawals in countries of concern; reverse transactions of this nature are also suspicious
- 12** Issuance of checks, money orders, or other financial instruments, often numbered sequentially, to the same or similarly named person or business

